UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Universal Propulsion Company
25401 North Central Avenue
Phoenix, Arizona 85027-9801

Attn: Steve Miller

REF: Visual Site Inspection, September 23, 1993
Universal Propulsion Company, Inc., Phoenix, Arizona (UPCO)

Dear Mr. Miller:

The purpose of this letter is to provide notification of the United States Environmental Protection Agency's (U.S. EPA's) plan to conduct a Visual Site Inspection (VSI) at Universal Propulsion Company, Inc. (UPCO) on September 23, 1993. We are hopeful that the information contained herein will allow you to better prepare and schedule for the VSI.

As you know, Science Applications International Corporation, Technology Services Company (SAIC/TSC) is the U.S. EPA's Region IX contractor and will be conducting the VSI at UPCO. Pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, this contractor has been duly designated by the U.S. EPA to conduct a VSI as part of the RCRA Facility Assessment (RFA). The SAIC/TSC representatives will be Ms. Sue Corbaley and Ms. Mary Wesling.

The VSI is an integral part of the RFA and is done to verify and determine the location of all solid waste management units (SWMUs) and areas of concern (AOCs). The term SWMU includes "any unit at the facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous wastes" (50FR 28702, July 15, 1985). This definition includes container storage units; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; open burn/open detonation (OBOD) units; underground injection wells; physical, chemical and biological treatment units; recycling units; and areas contaminated by routine and systematic discharges from process areas.

This inspection will enable the U.S. EPA and the Arizona Department of Environmental Quality to obtain a technical understanding of current and historical waste handling practices. Photographs of each SWMU are to be taken to document waste management practices and conditions at the facility.

Prior to the VSI, the inspection team will need to know of any health and safety requirements and special equipment needs. If there are any concerns with photographs or other security issues, please inform the inspection team before the inspection begins. The VSI is expected to begin at 7:30 a.m. on September 23, 1993, starting with a briefing session, and should be completed by about 4 p.m. that same day. Anyone wishing to be present for the inspection debriefing may want to be available the afternoon of September 23, 1993. This tentative schedule is subject to change regarding the length of the inspection and the exact time and date of the inspection debriefing due to the unknowns associated with the facility and the VSI. As you are aware, the VSI for your facility has

ATTACHMENT I: PROPOSED VSI SCHEDULE
Universal Propulsion Company, Inc., Phoenix, Arizona

Introductory Meeting

The inspection team will meet with UPCO personnel to discuss:

- Purpose of visit,
- Agenda,
- Safety and health considerations,
- Information needs pertaining to the potential SWMUs and AOCs identified during the Preliminary Review listed on pages I-3 through I-7 of this letter including processes which may result in the generation of waste streams.

Inspection Tour

The inspection team will tour the facility and examine each of the potential SWMUs and AOCs, listed below, that were identified during the preliminary file review and presented in the Preliminary Review (PR) report. Additional SWMUs and AOCs may be identified during the introductory meeting or while conducting the site inspection. These units will also be observed and evaluated, if possible, during the inspection.

primarily assembly house - no manufacturing

SOLID WASTE MANAGEMENT UNITS - SPECIFIC QUESTIONS AND INFORMATION NEEDS

1. SWMU No. 1: Open Burn/Open Detonation Unit (OBOD)

   a. Determine if the burning of 500 lbs of waste at one time (which, apparently is done on occasion) would be within Arizona air guidelines or standards as the ADEQ modeling showed for 300 lbs.
   b. Determine if air permit violations have occurred and if any significant incidences of health problems or nuisance have been reported by nearby residences.
   c. Determine the extent of potential for runoff to washes and ephemeral streams from the unit in the past. Specifically, determine the location of the observed burn residue in 1988.
   d. Where does the culvert that would have received runoff prior to 1989 discharge to. yes, shipped to h.w. landfill
   e. Determine if the soils underlying the original burn area were excavated prior to construction of the current burn pad.
   f. Determine the location of both burn areas photographed during the 1984 EPA inspection (18). Which one is the "original burn area." ?
   g. Determine the date of construction of the current burn pad.
   h. Determine if methods for sampling and analysis of the underlying soils met state of federal criteria for waste in (or on) land (EP Toxicity vs. TCLP). shipped off-site
   i. Determine where/how propellant wastes were disposed (or treated) prior to 1980. propellant plant was installed in 1980

burn pad (concrete) constructed in 1986

2. SWMU No. 2: Sandblasting Area and Waste Accumulation Point

   a. Design and waste management details of the sand/plastic media blasting area.
   b. Determine the potential for release to soil and air from the plastic media blasting area.
   c. Gain clearer understanding of the types of materials sand- and plastic media-blasted and the nature of the wastes, both current and in the past.
   d. Determine historic waste management practices (if any) for sandblasting activities that produced hazardous sand blast wastes prior to the use of plastic media. The SWMU No. 3 discussion implies that sandblast waste materials were at one time hazardous.
   e. Determine the potential for release from the prior sand blasting activities.

3. SWMU No. 3: Sandblast Waste in Dry Wash (Remediated and Closed) mostly on sides, not bottom of wash

   a. Determine location of this spill area.
   b. Identify where these contaminated sandblast waste sands originated from. Were they from sandblasting activities producing hazardous wastes that occurred prior to the use of plastic media? If so was there a potential for release at the sandblasting area (SWMU No. 2)?
   c. Determine the nature of operations that produced the sandblast grit (i.e., what was stripped to generate this waste).

8. SWMU No. 10: Propellant Water Bore Residual Tanks

   a. Determine the origin and details of the process that generates the "known to be non-hazardous" industrial waste waters that are evaporated in the fiberglass tanks.
   b. Determine the potential for release of powdery residue particulates to air and surrounding soil and if such a release would have significance.
   c. These tanks replaced less-contained units. Determine the past management practices including the structure and design of any former units (See SWMU No. 11).
   d. Determine the (exact) design features of these tanks, specifically the construction of the base of each tank and the associated containment.
   e. Determine/confirm dates of installation of all parts of this SWMU.

9. SWMU No. 11: Former Propellent Water Bore Residual Pit(s)

   a. Determine the location of the former pits, and if the pits in which the wastes were burned in place were in the same location as the remediated areas.
   b. Determine the details surrounding the waste water release at the bore-out unit and the status of soil/sediment characterization for contaminant release.
   c. Determine why the remediation effort refers to only one pit when the historical literature refers to at least two. Was the second pit close to the first pit and thus included in the remediation? Was the nature of the wastes in the second pit such that sampling was not required?
   d. Determine the potential for release of contaminated soils to the adjacent wash and if documented releases were observed.
   e. Determine the waste management practices for these waste streams prior to 1983.
   f. Determine how burn residue was handled after dried propellent was burned in place.
   g. Determine the nature of the discharge from the high pressure water bore that entered the small dry wash, as noted in the August 27, 1986 CEI (a).

10. SWMU No. 12: Ignitable and Reactive Waste Magazines

   a. Determine waste handling and transportation (pick-up truck) practices to determine if potential for release during these operations exists.

11. SWMU No. 13: Former Earth Covered Ignitable and Reactive Waste Magazines

   a. Determine the exact location of these units in relation to the current magazines.
   b. Determine the release potential to soil.
   c. Determine how the units were dismantled (if they were) and if any sampling or other closure activities were conducted.

d. Determine the potential for release to soils and groundwater. Determine if any soil/groundwater characterization for this unit has been conducted.

e. Determine the status and location of the waste water discharge to a small dry wash from the X Ray Film Developing Building that was reported in the September 9, 1989 CEI (9).

ask a previous involvement w/ this section

86 Q Lab - Same as 17

18. SWMU No. 20: Septic Tank (Leach Field) that Formerly Received Building C-11 Laboratory Wastewater

a. Determine the characteristics of the wastes and if they are a hazardous waste.
b. Determine the location and design characteristics of the leach field.
c. Determine the dates of operation.
d. Determine the potential for release to soils and groundwater.
e. Determine if any soil/groundwater characterization for this unit has been conducted.

19. SWMU No. 21: C Area Solid Propellant Manufacturing Tank

a. Determine the status of this release and if it is still occurring.
b. Determine if soil characterization was conducted at this site.
c. Determine the release potential to soil and surface water from this site.
d. Determine if soil remediation was conducted for this release.

AREAS OF CONCERN - SPECIFIC QUESTIONS AND INFORMATION NEEDS

1. Determine the locations of all AOCs in relation to SWMUs, water wells, surface water and population.

2. Provide any information on the past or current status of these areas which relates to generation, treatment, storage, or disposal of waste, including waste types and volumes.

3. Include details of the operational uses and design of the AOCs.

4. Give all information on any spills of hazardous materials at any of the AOCs.